STATIONARY SOURCE PERMIT TO MODIFY AND OPERATE

This permit replaces your permit dated April 21, 2005, as amended March 28, 2006.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

O'Sullivan Films, Inc.
1944 Valley Avenue
Winchester, Virginia 22601
Registration No.: 80333
Plant ID No.: 51-840-0060

is authorized to modify and operate

a performance polymer and engineered film calendering, coating, and printing facility

located at

1944 Valley Avenue
Winchester

in accordance with the Conditions of this permit.

Approved on: April 21, 2005

Amended on: March 28, 2006

Amended on: DRAFT

Deputy Regional Director, Valley Region

Permit consists of 12 pages.
Permit Conditions 1 to 36.

INTRODUCTION

This permit approval is based on the permit applications dated January 27, 1996, August 29, 2003, February 8, 2005, and January 10, 2008, including amendment information dated March 2, 2006, July 12, September 17, and November 25, 1996, October 13, 1997, February 25, April 3, April 9, April 14, and June 16,1998, July 9, August 30, September 15, November 3, and December 17, 1999, October 17, 2000, March 11 and May 14, 2002, and May 9, August 29, and December 9, 2003, March 18, 2004, and March 2, 2006. Any changes in the permit application specifications or any existing facilities that alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** - Equipment to be modified and operated at this facility consists of:

   - Laminator 1 (LAM1)

   Previously installed equipment at this facility prior to the date of this permit consists of:

   - American Hydrotherm 1966 Hot Oil Generator (PH1) rated at 16.8 MMBtu/hr
   - Paint Lines 2, 3, and 4 (PL2, PL3, and PL4)
   - Laminator 3 (LAM3)
   - Laminator 4 (LAM4)

- a Paint Kitchen (PK)
- a Paint Laboratory (PLAB)

(9 VAC 5-80-1180 D 3)

2. **Emission Controls: Laminator 1 –** Volatile Organic Compound (VOC) emissions from Laminator 1 (LAM1) shall be controlled by use of waterborne coatings only, as defined in EPA Method 24 (40 CFR 60, Appendix A).
(9 VAC 5-80-1180)

3. **Emission Controls: Laminator 3** – VOC emissions from Laminator 3 (LAM3) shall be controlled by a 95% efficient capture system and a regenerative thermal oxidizer (RTO). The regenerative thermal oxidizer shall be provided with adequate access for inspection and shall be in operation when the Laminator 3 (LAM3) is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

4. **Emission Controls: Paint Lines 2 & 3** – VOC emissions from Paint Line 2 and Paint Line 3 (PL2 and PL3) shall be controlled by an 80% efficient capture system and a RTO. The RTO shall be provided with adequate access for inspection and shall be in operation when Paint Line 2 or Paint Line 3 (PL2 and PL3) is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

5. **Emission Controls: Paint Line 4** – VOC emissions from Paint Line 4 (PL4) shall be controlled by a permanent total enclosure and a RTO. The RTO shall be provided with adequate access for inspection and shall be in operation when Paint Line 4 (PL4) is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

6. **Emission Controls: Paint Kitchen** – VOC emissions from the Paint Kitchen (PK) shall be controlled by a permanent total enclosure and a RTO having a control efficiency of at least 95.0%. The RTO shall be provided with adequate access for inspection and shall be in operation when the Paint Kitchen (PK) is operating.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

7. **Control Efficiency: RTO 1 -** The RTO serving Paint Lines 2 and 3 (PL2 – PL3) and Laminator 3 (LAM3) shall maintain a control efficiency for VOC of no less than 95.0% on a mass basis.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

8. **Control Efficiency: RTO 2 -** The RTO serving Paint Line 4 (PL4) shall maintain a control efficiency for VOC of no less than 98.6% on a mass basis.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

9. **Total Enclosure (Pollution Prevention (P2)) -** The total enclosure shall meet the following criteria:

   a. Any natural draft openings shall be at least 4 equivalent opening diameters from each VOC emitting point;

   b. The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

   c. The average facial velocity of air through the natural draft openings shall be at least 200 feet per minute and the direction of flow shall be into the enclosure;

   d. All access doors and windows shall be closed during routine operation of the paint lines;

   e. All of the exhaust gases from the enclosure shall be directed to the thermal incinerator.

   (9 VAC 5-50-260 and 9 VAC 5-80-1180)

10. **Control Parameters: RTO 1** - The RTO controlling Paint Lines 2 and 3 (PL2 – PL3) and Laminator 3 (LAM3) shall maintain a minimum combustion zone temperature of 1428˚ F and a residence time of at least 0.5 seconds. The minimum combustion zone temperature shall be calculated as a three-hour average. Details concerning the method of calculating the three-hour average combustion zone temperature shall be arranged with the Director, Valley Regional Office.
    (9 VAC 5-80-1180 and 9 VAC 5-50-260)

11. **Control Parameters: RTO 2** - The RTO controlling Paint Line 4 (PL4) shall maintain a minimum combustion zone temperature of 1441˚ F and a residence time of at least 1.0 second. The minimum combustion zone temperature shall be calculated as a three-hour average. Details concerning the method of calculating the three-hour average combustion zone temperature shall be arranged with the Director, Valley Regional Office.
    (9 VAC 5-80-1180 and 9 VAC 5-50-260)

12. **Monitoring Devices: RTOs** – Each RTO shall be equipped with devices to continuously measure and record oxidizer chamber temperature. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the RTO is operating.
    (9 VAC 5-80-1180 and 9 VAC 5-50-260)

13. **Test/Monitoring Ports -** The permitted facility shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. This includes constructing the facility such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing stack

or duct that is free from cyclonic flow. Test ports shall be provided when requested at the appropriate locations.
(9 VAC 5-50-30 F and 9 VAC 5-80-1180)

14. **Emissions Calculation** - Annual VOC emissions shall be calculated by mass balance as specified by the formula below:

$$V_{EM} = V_{TPUT} - V_{REC} - V_{RET}$$

V_{EM} = Annual emissions of VOCs in tons.

V_{TPUT} = Annual throughput of VOCs in tons.

V_{REC} = Annual amount of VOCs recovered or disposed of off-site in tons.

V_{RET} = Annual amount of VOCs retained in the products in tons.

Annual VOC emissions shall be calculated monthly as the sum of the previous consecutive 12-month period. The details of the V_{REC} and the V_{RET} calculations shall be arranged with the Director, Valley Regional Office.
(9 VAC 5-80-1180)

15. **Hazardous Air Pollutants (P2)** - The permittee shall regularly investigate the technical feasibility of using coatings having lower volatile or hazardous air pollutant content on Laminators 3 and 4. The results of such feasibility studies shall be reported semi-annually as required by Condition 28. Details of the studies shall be arranged with the Director, Valley Regional Office.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

OPERATING/EMISSION LIMITATIONS

16. **Operating Hours: Paint Line 4 –** Paint Line 4 (PL4) shall operate no more than 7,140 hours per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-1180)

17. **Fuel: Hot Oil Generator (P2)** - The approved fuels for the American Hydrotherm 1966 Hot Oil Generator (PH1) are natural gas and distillate oil. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-1180)

18. **Fuel: RTOs (P2)** - The approved fuels for combustion in the RTOs are natural gas and distillate oil. A change in the fuel may require a permit to modify and operate. (9 VAC 5-80-1180)

19. **Fuel Specifications** - The fuel shall meet the specifications below:

    DISTILLATE OIL which meets the ASTM D396 specifications for numbers 1 or 2 fuel oil:
    Maximum sulfur content per shipment: 0.5%

    (9 VAC 5-80-1180)

20. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:

    a. The name of the fuel supplier;

    b. The date on which the distillate oil was received;

    c. The volume of distillate oil delivered in the shipment;

    d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications for numbers 1 or 2 fuel oil; and

    e. The sulfur content of the distillate oil.

    (9 VAC 5-80-1180)

21. **Throughput: Laminator 1 –** The throughput of VOC to Laminator 1 (LAM1) shall not exceed 9.8 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
    (9 VAC 5-80-1180)

22. **Emission Limits: Hot Oil Generator** - Emissions from the operation of the American Hydrotherm 1966 Hot Oil Generator (PH1) shall not exceed the limits specified below:

PM-10	0.13	lbs/hr	0.56	tons/yr
Sulfur Dioxide	8.74	lbs/hr	38.29	tons/yr
Carbon Monoxide	1.41	lbs/hr	6.18	tons/yr
Nitrogen Dioxide	2.43	lbs/hr	10.66	tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition 26.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

23. **Emission Limits** - VOC emissions shall not exceed the limits specified below:

Paint Lines 2, & 3 and Paint Kitchen	998	tpy
Paint Line 4	39	tpy
Paint Laboratory	30	tpy
Laminator 1	9.8	tpy
Laminator 3	100	tpy
Laminator 4	100	tpy

Compliance shall be demonstrated by mass balance as specified in Condition 14, performed monthly for each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

24. **Visible Emission Limit: Hot Oil Generator** - Visible emissions from the American Hydrotherm 1966 Hot Oil Generator (PH1) shall not exceed 10% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 20% opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A).
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

25. **Visible Emission Limit: RTOs** - Visible emissions from each RTO shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR Part 60, Appendix A).
(9 VAC 5-80-1180 and 9 VAC 5-50-260)

RECORDS

26. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. Records shall include, but are not limited to:

a. Monthly and annual hours of operation for Paint Line 4. Annual operating hours shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

b. Monthly and annual throughput of natural gas and distillate oil. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period;

c. Monthly emissions calculations for emissions from the American Hydrotherm Hot Oil Generator (PH1) stack using calculation methods approved by the Director, Valley Regional Office, to verify compliance with the ton/yr emissions limitations in Condition 22. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

d. All fuel supplier certifications;

e. VOC content (pounds/gallon) of each coating, paint, and adhesive used;

f. Monthly and annual use (in gallons) of each paint for Paint Lines 2, 3, and 4 (PL2 – PL4). Annual use shall be calculated as the sum of each consecutive 12 month period;

g. Monthly and annual use (in gallons) of each paint for the Paint Laboratory (PLAB). Annual use shall be calculated as the sum of each consecutive 12 month period;

h. Monthly and annual use (in gallons) of each adhesive and coating for Laminators 1, 3 and 4 (LAM1, LAM3 and LAM4). Annual use shall be calculated as the sum of each consecutive 12 month period;

i. Monthly and annual throughput (in tons) of VOC to Laminator 1 (LAM1). Annual throughput shall be calculated as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

j. Monthly and annual VOC (in tons) retained in the recovered coatings and products for Paint Lines 2, 3, and 4 (PL2 – PL4). Annual mass of compounds retained shall be calculated as the sum of each consecutive 12 month period;

k. Monthly and annual VOC (in tons) retained in hazardous waste and laminator products for Laminators 1, 3 and 4 (LAM1, LAM3 and LAM4). Annual mass of compounds retained shall be calculated as the sum of each consecutive 12 month period;

l. Monthly and annual VOC emissions (in tons) from Paint Lines 2, 3, and 4 (PL2 – PL4), the Paint Kitchen (PK), the Paint Laboratory (PLAB), and Laminators 1, 3 and 4 (LAM1,

LAM3 and LAM4). Annual emissions shall be calculated as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;

m. Average combustion zone temperature (during actual painting or laminating operations) of the RTO serving Paint Lines 2 and 3 (PL2 – PL3) and Laminator 3 (LAM3), calculated hourly as an average of the temperatures during the previous three hours;

n. Monthly records of any three-hour period (during actual painting or laminating operations) during which the average combustion zone temperature of the RTO serving Paint Lines 2 and 3 (PL2 – PL3) and Laminator 3 (LAM3) is below 1428°F and the total hours of RTO operation;

o. Average combustion zone temperature (during actual painting operations) of the RTO serving Paint Line 4 (PL4), calculated hourly as an average of the temperatures during the previous three hours;

p. Monthly records of any three-hour period (during actual painting operations) during which the average combustion zone temperature of the RTO serving Paint Line 4 (PL4) is below 1441°F and the total hours of RTO operation;

q. For each RTO, acquisition read outs showing the combustion zone temperature;

r. Test results verifying the 95% capture efficiency required for Laminator 3 by Condition 3.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-1180 and 9 VAC 5-50-50)

27. **Reports - RTO** - Written reports shall be submitted quarterly to the Director, Valley Regional Office, showing:

a. For the RTO serving Paint Lines 2 and 3 (PL2 – PL3) and Laminator 3 (LAM3), any three-hour period (during actual painting or laminating operations) during which the average combustion zone temperature is below 1428°F and the total hours of RTO operation;

b. For the RTO serving Paint Line 4 (PL4), any three-hour period (during actual painting operations) during which the average combustion zone temperature is below 1441°F and the total hours of RTO operation.

The submission of quarterly reports may be discontinued at any time upon written notification from the Director, Valley Regional Office.
(9 VAC 5-50-50)

28. **Reports – Pollution Prevention for Hazardous Air Pollutants** - The permittee shall submit a status report semi-annually addressing results of the feasibility studies required by Condition 15. Reports shall include, but not be limited to:

    a. A summary of the coatings evaluated during the previous six months;

    b. Results of the coating evaluation;

    c. The hazardous air pollutant (HAP) content (in lbs HAP/ lb coating used), calculated as an average of all coatings used on Laminators 3 and 4 (LAM3 and LAM4) for the previous six months.

    Details of the reporting format shall be arranged with the Director, Valley Regional Office.
    (9 VAC 5-50-50)

NOTIFICATION

29. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Valley Regional Office, of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but not later than four daytime business hours of discovery of the malfunction. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of its discovery. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Valley Regional Office..
    (9 VAC 5-20-180 C and 9 VAC 5-80-1180)

GENERAL CONDITIONS

30. **Right of Entry** - The permittee shall allow authorized local, state and federal representatives, upon the presentation of credentials:

    a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

    b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

    c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-1180)

31. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-1180)

32. **Maintenance/Operating Procedures** - At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance;

b. Maintain an inventory of spare parts;

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum;

d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E and 9 VA 5-80-1180 D)

33. **Record of Malfunctions** – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9VAC 5-20-180 J and 9 VAC 5-80-1180 D)

34. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

    a. Knowingly makes material misstatements in the application for this permit or any amendments to it;

    b. Fails to comply with the conditions of this permit;
    c. Fails to comply with any emission standards applicable to a permitted emission unit;

    d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard; or

    e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect on the date that the application for this permit is submitted.

    (9 VAC 5-80-1210 F)

35. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Valley Regional Office, of the change in ownership within 30 days of the transfer.
    (9 VAC 5-80-1240)

36. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
    (9 VAC 5-80-1180)

PERMIT CHECK LIST

Date: February 7, 2008
Source/Facility Name: O'Sullivan Films, Inc.
Registration No.: 80333 Plant ID No.: 840-0060

Source Location
Address: 1944 Valley Avenue
City: Winchester State: Virginia Zip: 22601

Source Mailing Address
Address: 1944 Valley Avenue
City: Winchester State: Virginia Zip: 22601

Greenfield? YES ☐ NO ☒

Current Source Classification (if not a Greenfield)
Minor ☐ Synthetic Minor ☐ PSD Major ☒ Title V Major ☒

Permit Action: (Describe new/modified equipment and/or processes, include maximum rated capacities)
Amend the existing minor NSR permit to revise the regenerative thermal oxidizers (RTOs) minimum combustion zone temperatures as a result of the performance testing conducted for RTOs.

Permit Action Type

New Source Review
Minor ☐ State Major ☐ PSD Major ☐ Exemption ☐ General Permit ☐
Install ☐ Construct ☐ Modify ☐ Relocate ☐
Admin Amend ☐ Minor Amend ☐ Sig Amend ☒

State Operating Permit
New ☐ Admin Amend ☐ Minor Amend ☐ Significant Amendment ☐

Permit includes all emissions units at source YES ☐ NO ☒ Exemption/NA ☐

After this action the source is:
Major (A) ☒ Minor (B) ☐ Synthetic Minor (SM) ☐ PSD ☒

Permit Application Review
☒ Permit application submitted or ☐ Letter Request
YES ☒ NO ☐ NA ☐ Document Certification Form received with Form 7
YES ☐ NO ☐ NA ☒ Confidential information. If yes, checklist completed/letter sent.
YES ☐ NO ☐ NA ☒ Public copy received
YES ☐ NA ☒ Copy of letter from local official for greenfield, or major modified sources
YES ☐ NA ☒ Greenfield Site Evaluation
YES ☒ NO ☐ NA ☐ Permit **replaces** other permit(s). If yes, list permit dates: April 21, 2005 as amended March 28, 2006

Regulatory Review
BACT Determination (check one):
☐ Control strategy meets BACT.
Comments:
☒ Exemption/General Permit/SOP or **Amendment** - BACT not applicable.
Rule Applicability
YES ☐ NO ☒ NSPS/MACT/NESHAPS Applicability: If Y, Subpart(s):
NSPS ☐ Subpart: MACT ☐ Subpart: NESHAPS ☐ Subpart:
Comments:

YES ☐ NO ☒ Existing Rule(s) applicability: If Y, Rule(s):

Comments:

Toxic Pollutants (check one):

☐ Exempt ☐ in compliance with 9 VAC 5-60-320 ☒ not evaluated

Comments:

Modeling (check one):

☐ Attached

☐ Copy of approval letter from modeling section

☒ No modeling required by agency policy (< modeling significance levels, etc.)

Comments:

Site Inspected	YES ☒	NO ☐	If yes, inspection date: April 18, 2007	
Calculation sheet(s) attached		YES ☐	NO ☐	NA ☒
NSR Netting		YES ☐	NO ☐	NA ☒

Comments:

Pollution Prevention

Permit contains the following pollution prevention provisions (check all that apply):

- ☐ Administrative controls, material/fuel limitations or work practices that reduce or eliminate air pollution
- ☐ Emission/throughput limitations to avoid add-on controls
- ☐ Emission/operating limitations to avoid regulatory requirements (PSD, TV, State Major, MACT, 112g)
- ☐ Reporting Requirements. If checked, frequency is [Quarterly, Semi-annual, Annual, Other]

Public Participation

Public Notice Required	YES ☒	NO ☐	NA ☐	If yes, Public Notice Date: February 16, 2008 to March 16, 2008 (concurrent permit action with Title V Permit Modification)
Public Comments	YES ☐	NO ☐	NA ☐	
Public Hearing Required	YES ☐	NO ☐	NA ☐	If yes, Public Hearing date:

Other Comments and Final Recommendations (attach memo or list below):

Items to explain in comment section of checklist, or memo as applicable:

1) Unusual circumstances, calculations, or analysis.
2) Central Office input.
3) APM discussions and input.
4) Boilerplate deviations, and if superseding existing permit(s), changes from previous permit(s).
5) Explanation if complete date is not the same as the last information submitted.
6) Special compliance monitoring or recordkeeping requirements (initial or continuous)
7) Rationale for calculation of Uncontrolled/Controlled Emissions and/or Potential-to-Emit.

Comments: On January 16, 2008, O'Sullivan Films, Inc. (O'Sullivan) submitted an air permit application to modify its minor NSR permit dated April 21, 2005 as amended March 28, 2006. O'Sullivan would like to revise the regenerative thermal ''oxidizers (RTOs) minimum combustion zone temperatures as a result of the performance testing conducted for RTOs. The performance testing conducted on May 22-25, 2006, indicated that the minimum combustion zone temperatures needed to achieve the required destruction efficiencies for RTO #1 and RTO #2 are 1,428^{0}F and 1,441^{0}F, respectively.

The facility's minor NSR permit dated April 21, 2005 as amended March 28, 2006 will be amended to revise the RTOs' minimum combustion zone temperatures. The minimum combustion zone temperature for RTO #1 will be changed from 1,475^{0}F to 1,428^{0}F and for RTO #2, the temperature will be changed from 1,550^{0}F to 1,441^{0}F. Conditions 11, 12, 27.n, 27.p, 28.a and 28.b of the existing permit have been revised to reflect the new temperatures. Also, the reference to "strip charts" in Condition 27.q was changed to "acquisition read outs".

The above noted changes meet the requirements of 9 VAC 5-80-1290 for a significant amendment to a new source review permit. Also, the existing permit has been updated to reflect current boilerplate language.

O'Sullivan has also requested modification of its Title V permit for the above noted changes. Accordingly, along with this minor NSR permit action, the facility's Title V permit is being modified to include the revised minimum combustion zone temperatures for the RTOs. Since this minor NSR permit action is being concurrently processed with significant modification of Title V permit, this permit action will also follow the public participation requirements of Title V permit. A public hearing has been scheduled on May 5, 2008. Public comments will be received until May 20, 2008.

Recommendation: Pending public participation requirements.

Environmental Engineer's Signature:		Date:
Air Permit Manager's Signature:		Date: